

Exhibit A

From: [Disher, Todd](#)
To: [Nina Perales](#)
Cc: [Biggs, Adam](#); [Toth, Michael](#); [Alejandra Avila](#)
Subject: RE: Texas et al. v. United States et al., No. 1:18-cv-00068
Date: Monday, May 13, 2019 1:10:00 PM
Attachments: [image001.png](#)

Nina,

Your February 1 letter does not explain why the additional discovery you seek is proportional to the needs of the case, particularly given that it is the Plaintiff States' burden to establish standing. Again, if the Intervenor believe that there is specific information they require in order to respond to the evidence cited in the motion for summary judgment, we are happy to discuss that with you.

Todd

Todd Lawrence Disher

Trial Counsel for Civil Litigation
Office of the Attorney General of Texas
P.O. Box 12548 (MC 001)
Austin, TX 78711-2548
(512) 936-2266
Todd.Disher@oag.texas.gov

From: Nina Perales [<mailto:nperales@MALDEF.org>]
Sent: Monday, May 13, 2019 12:08 PM
To: Disher, Todd <Todd.Disher@oag.texas.gov>
Cc: Biggs, Adam <Adam.Biggs@oag.texas.gov>; Toth, Michael <Michael.Toth@oag.texas.gov>;
Alejandra Avila <Aavila@MALDEF.org>
Subject: Re: Texas et al. v. United States et al., No. 1:18-cv-00068

Todd,

The specific information that we believe we are lacking is set out in our deficiency letter of [February 1](#). You have already responded to that letter and indicated that you would not provide any additional information. Plaintiffs also did not provide any information in response to our fifth set of discovery requests.

After these attempts to secure discovery, we believe that unfortunately the court's involvement is necessary.

Thank you,

Nina Perales
Vice President of Litigation
Mexican American Legal Defense
and Educational Fund, Inc. (MALDEF)
[110 Broadway, Suite 300](#)

San Antonio, TX 78205
Ph (210) 224-5476 ext. 206
FAX (210) 224-5382



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On May 10, 2019, at 5:16 PM, Disher, Todd <Todd.Disher@oag.texas.gov> wrote:

Nina,

Moving to compel on the entirety of your discovery requests is of course your prerogative, and we will stand on our over-breath and other objections. However, if there is specific information that you believe you are lacking in order to file a complete response to the cited evidence, we can discuss whether we can provide that information without the Court's involvement.

Todd

Todd Lawrence Disher

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On May 10, 2019, at 4:53 PM, Nina Perales <nperales@MALDEF.org> wrote:

Todd,

Thank you for your response. Although we do plan to respond to your cited evidence, we also need responses to our discovery requests. We understand that you disagree with this position and will inform the court that you oppose the motion to compel unless you advise us otherwise.

Thanks again and have a good weekend,

Nina Perales
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<image001.png>

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From: Disher, Todd [<mailto:Todd.Disher@oag.texas.gov>]
Sent: Friday, May 10, 2019 4:42 PM
To: Nina Perales
Cc: Biggs, Adam; Toth, Michael; Alejandra Avila
Subject: RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Nina,

The discovery requests referenced below appear to seek information related to potential injuries suffered by the Plaintiff States. The evidence that the Plaintiffs States rely on to establish their standing at this stage is cited in their motion for summary judgment. Is there a reason why Intervenor cannot fully respond to that cited evidence (or argue that such cited evidence is insufficient) rather than attempt to seek discovery related to potential injuries not cited in the motion for summary judgment?

Todd

Todd Lawrence Disher

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From: Nina Perales [<mailto:nperales@MALDEF.org>]
Sent: Friday, May 10, 2019 3:22 PM
To: Disher, Todd <Todd.Disher@oag.texas.gov>
Cc: Biggs, Adam <Adam.Biggs@oag.texas.gov>; Toth, Michael
<Michael.Toth@oag.texas.gov>; Alejandra Avila <Aavila@MALDEF.org>
Subject: RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Dear Todd,

Defendant Intervenors Karla Perez, et al. plan to move to compel Plaintiffs' answers to Interrogatories Nos. 4-15 and 18-21 and production in response to Requests for Production Nos. 2 and 8. We also plan to request that the Court dismiss the non-Texas Plaintiffs in the case and enter a stay.

Please advise whether Plaintiffs oppose the motion. Thank you very much,

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